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13 **UNITED STATES DISTRICT COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**  
15 **OAKLAND DIVISION**

16 IN RE: CATHODE RAY TUBE (CRT)  
17 ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

18 This Document Relates to:

19 *ALL INDIRECT PURCHASER ACTIONS*

**DECLARATION OF WYATT M. CARLOCK  
IN SUPPORT OF IRICO DEFENDANTS'  
MOTION IN LIMINE #1 TO COMPEL  
PLAINTIFFS TO REFER TO DEFENDANT  
IRICO GROUP CORP. AND IRICO  
DISPLAY DEVICES CO., LTD. AS  
SEPARATE CORPORATE ENTITIES**

22 Judge: Honorable Jon S. Tigar  
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1 I, Wyatt M. Carlock, declare as follows:

2 1. I am a member of the bar of the District of Columbia and admitted to practice before  
3 this Court *pro hac vice*. I am an attorney with Baker Botts L.L.P., which represents Defendants  
4 Irico Group Corporation (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico Display,”  
5 collectively, “Irico” or the “Irico Defendants”) in this action. I make this Declaration in support of  
6 Irico Defendants’ Motion in Limine #1 To Compel Plaintiffs to Refer to Defendant Irico Group  
7 Corp. and Irico Display Devices Co., Ltd. as Separate Corporate Entities. If called as a witness, I  
8 could and would testify to the matters set forth in this declaration of my own personal knowledge.

9 2. Attached hereto as Exhibit 1 is a true and correct copy of various personnel notices  
10 issued by State Council, Ministries of Personnel and Electronics Industry, and Irico Group, marked  
11 Nos. 00014, 145, 70, 194, 84, 55, 145 and Bates stamped IRI-CRT-0000865 through 875, and a  
12 translation thereof.

13 3. Attached hereto as Exhibit 2 is a Request for Instructions Regarding Formation of  
14 Irico Group Company issued by the 4400 CRT Plant marked No. 274, dated October 18, 1988 and  
15 Bates stamped IRI-CRT-00000530 through 532, and a translation thereof.

16 4. Attached hereto as Exhibit 3 is a true and correct copy of a Registration Form for  
17 Change of Ownership of State-owned Assets issued by the Ministry of Findings of the People’s  
18 Republic of China, dated December 25, 2000 and Bates stamped IRI-CRT-00000512 through -516,  
19 and a translation thereof.

20 5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from Irico Group  
21 Electronics Co. Ltd.’s (“Electronics”) 2004 Annual Report, published by Irico Group Electronics  
22 (now known as Irico Group New Energy Co. Ltd.).

23 6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from Irico Electronics  
24 2015 Annual Report, published by Irico Electronics.

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1 I declare under penalty of perjury that the foregoing is true and correct. Executed this 11th  
2 day of August, 2023, in Arlington, Virginia.

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4 /s/ Wyatt M. Carlock

5 Wyatt M. Carlock (*pro hac vice*)  
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